

Richard J. Grabowski (State Bar No. 125666)  
rgrabowski@JonesDay.com  
John A Vogt (State Bar No. 198677)  
javogt@jonesday.com  
JONES DAY  
3161 Michelson Drive, Suite 800  
Irvine, CA 92612.4408  
Telephone: +1.949.851.3939  
Facsimile: +1.949.553.7539

Attorneys for Defendant  
EXPERIAN INFORMATION SOLUTIONS, INC.

TINA WOLFSON, SBN 174806  
twolfson@ahdootwolfson.com  
ROBERT AHDOOT, SBN 172098  
rahdoot@ahdootwolfson.com  
**AHDOOT & WOLFSON, PC**  
1016 Palm Avenue  
West Hollywood, California 90069  
Tel: (310) 474-9111; Fax: (310) 474-8585

Attorneys for Plaintiff and the Putative Classes

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

DIPAK BHUTA, individually and on  
behalf of all others similarly situated;

Plaintiff,

vs.

EXPERIAN INFORMATION  
SOLUTIONS, INC.,

Defendant.

Case No. 8:15-cv-01592 AG (DFMx)

Hon. Andrew J. Guilford

**STIPULATION TO VACATE L.R.  
23-3 DEADLINE TO FILE  
MOTION FOR CERTIFICATION**

Complaint filed: Oct. 2, 2015  
Complaint Served: Oct. 14, 2015  
Current L.R. 23-3 Date: Jan 12, 2016

1 Plaintiff, individually and on behalf of a class of similarly situated persons  
2 (“Plaintiff”), and Defendant Experian Information Solutions, Inc., (“Defendant”),  
3 through their counsel, hereby stipulate to entry of the concurrently filed [Proposed]  
4 Order, which would vacate the 90-day deadline to file a motion for certification in  
5 this action under Local Rule 23-3.

6 Pursuant to Local Rule 5-4.3.4, Robert Ahdoot hereby attests that the  
7 following signatories concur in the filing’s content and have authorized the filing.  
8

9 Dated: October 22, 2015

JONES DAY

10 By: /s/ Richard J. Grabowski

11 Richard J. Grabowski

12 Counsel for Defendant  
13 EXPERIAN INFORMATION  
SOLUTIONS, INC.

14 Dated: October 22, 2015

ADHOOT AND WOLFSON APC

15  
16 By: /s/ Robert Ahdoot

17 Robert Ahdoot

18 Counsel for Plaintiff  
19 DIPAK BHUTA  
20  
21  
22  
23  
24  
25  
26  
27  
28